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22 *and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)*

23 **IN THE UNITED STATES DISTRICT COURT**
24 **NORTHERN DISTRICT OF CALIFORNIA**
25 **SAN FRANCISCO DIVISION**

26 In re: CATHODE RAY TUBE (CRT) ANTITRUST
27 LITIGATION

Case No. 07-5944 SC

MDL. No. 1917

28 This Document Relates to:

Sharp Elecs. Corp., et al. v. Hitachi, Ltd., et al., No.
13-cv-01173

**DECLARATION OF JENNIFER M.
STEWART IN SUPPORT OF SHARP'S
ADMINISTRATIVE MOTION TO
SEAL DOCUMENTS PURSUANT TO
CIVIL LOCAL RULES 7-11 AND 79-
5(b)**

[re Panasonic Documents]

1 I, Jennifer M. Stewart, declare as follows:

2 1. I am an attorney with Winston & Strawn LLP, counsel for Defendants Panasonic
3 Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a
4 Matsushita Electric Industrial Co., Ltd.) (collectively, the “Panasonic Defendants”) in these actions.
5 I am a member of the bar of the State of New York and I am admitted to practice before this Court
6 *pro hac vice*. Except for those matters stated on information and belief, about which I am informed
7 and which I believe to be true, I have personal knowledge of the facts stated herein and, if called as a
8 witness, I could and would competently testify thereto.

9 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter
10 (Dkt. 306). On December 3, 2013, Plaintiffs Sharp Electronics Corporation and Sharp Electronics
11 Manufacturing Company of America, Inc. (collectively, “Sharp”) filed an Administrative Motion to
12 Seal (Dkt. 2243), and lodged conditionally under seal, the following documents pursuant to Civil
13 Local Rules 7-11 and 79(b):

14 (a) Portions of Sharp’s Motion to Compel;

15 (b) Exhibits C, D, E and K to the Declaration of Craig Benson in Support of Sharp’s
16 Motion to Compel (“Benson Declaration”).

17 3. Pursuant to Civil Local Rule 79-5(e), I make this declaration on behalf of the
18 Panasonic Defendants to provide the basis for the Court to maintain under seal certain documents
19 and information quoted from, described, or otherwise summarized in Sharp’s Motion to Compel and
20 the exhibits to the Benson Declaration that have been designated by the Panasonic Defendants as
21 “Confidential” or “Highly Confidential” pursuant to the Stipulated Protective Order.

22 4. Attached as Exhibit E to the Benson Declaration is a copy of Attachment A to the
23 Panasonic Defendants’ Responses and Objections to Sharp’s First Set of Interrogatories.

24 5. Upon information and belief, the document appearing in full in Exhibit E to the
25 Benson Declaration consists of, cites to, and/or identifies confidential, nonpublic, proprietary and
26 highly sensitive business information. The document contains, cites, and/or identifies confidential
27 information about the Panasonic Defendants’ business practices, internal practices, business and
28

1 supply agreements and competitive positions. I am informed and believe that this is sensitive
2 information and public disclosure of this information presents a risk of undermining the Panasonic
3 Defendants' business relationships, would cause it harm with respect to its competitors and
4 customers, and would put the Panasonic Defendants at a competitive disadvantage.

5 6. Attached as Exhibit K to the Benson Declaration is a copy of the Panasonic
6 Defendants' Responses and Objections to Sharp's First Set of Interrogatories, dated October 24,
7 2013.

8 7. Upon information and belief, the document appearing in full in Exhibit K to the
9 Benson Declaration consists of, cites to, and/or identifies confidential, nonpublic, proprietary and
10 highly sensitive business information. The document contains, cites, and/or identifies confidential
11 information about the Panasonic Defendants' business practices, internal practices, business and
12 supply agreements and competitive positions. I am informed and believe that this is sensitive
13 information and public disclosure of this information presents a risk of undermining the Panasonic
14 Defendants' business relationships, would cause it harm with respect to its competitors and
15 customers, and would put the Panasonic Defendants at a competitive disadvantage.

16 8. Sharp's Motion to Compel and Exhibits E and K to the Benson Declaration quote
17 from or describe documents or information designated as "Confidential" by the Panasonic
18 Defendants pursuant to the Stipulated Protective Order. As with the exhibits themselves, I
19 understand that the Panasonic Defendants consider any statements in Sharp's Motion to Compel
20 purporting to summarize the exhibits or any other documents or information designated
21 "Confidential" or "Highly Confidential" by the Panasonic Defendants confidential and proprietary. I
22 am informed and believe that the Panasonic Defendants have taken reasonable steps to preserve the
23 confidentiality of information of the type contained, identified, or cited to in Sharp's Motion to
24 Compel and Exhibits E and K to the Benson Declaration.

25 9. I declare under penalty of perjury under the laws of the United States of America that
26 the foregoing is true and correct.

1 DATED: December 9, 2013

By: /s/ Jennifer M. Stewart
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